

IN THE DISTRICT COURT OF THE UNITED STATES

For the Western District of New York

**NOVEMBER 2012 GRAND JURY
(Impaneled 11/09/12)**

THE UNITED STATES OF AMERICA

INDICTMENT

-vs-

RANDALL LOSE

Violations:
Title 18, United States Code,
Sections 2251(a) and 2252A(a)(2)(A)
(11 Counts and Forfeiture Allegation)

**COUNTS 1-10
(Production of Child Pornography)**

The Grand Jury Charges That:

1. Between in or about February 25, 2011, and on or about April 1, 2011, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the defendant, **RANDALL LOSE**, did knowingly employ, use, persuade, entice, and coerce a minor, that is, Victim 1, a person known to the Grand Jury, who was less than 18 years old, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2) for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce, and knowing and having reason to know that such visual depictions would be transported and

transmitted in and affecting interstate and foreign commerce, and the visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce, and the visual depictions were transported and transmitted in and affecting interstate and foreign commerce.

2. Said visual depictions were transmitted by the victim to the defendant, by way of Skype, an Internet video-conferencing program, and were recorded and saved by the defendant under the following file names:

COUNT	FILE NAME
1	clip0010.avi
2	clip0013.avi
3	clip0014.avi
4	clip0020.avi
5	clip0021.avi
6	clip0022.avi
7	clip0023.avi
8	clip0028.avi
9	clip0029.avi
10	clip0033.avi

All in violation of Title 18, United States Code, Section 2251(a) .

COUNT 11
(Receipt of Child Pornography)

The Grand Jury Further Charges That:

Between in or about February 25, 2011, and on or about April 1, 2011, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the defendant, **RANDALL LOSE**, did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8), which had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and had been shipped and transported using any means and facility of interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 2252A(a) (2) (A) .

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

As a result of committing any of the offenses alleged in Counts 1 through 11 of this Indictment, the defendant, **RANDALL LOSE**, shall forfeit to the United States all property, real and personal, involved in the offense of conviction, and all property traceable to such property including but not limited to the following:

1. 1B1- Dell Inspiron laptop service tag: 4Y2CWJ1;

2. 1B3- Sandisk 16GB Micro SD card with S/N:
1124708505DF1;
3. 1B4- Sandisk 8GB Micro SD card with S/N:
115308088DOV;
4. 1B8- Sandisk Cruzer 4GB flash drive with S/N:
20052737020ED8A2;
5. 1B10- Sandisk Cruzer 4GB flash drive with S/N:
2845011149819D50;
6. 1B11- Kingston Data Traveler 1GBFlash Drive; and
7. 1B14- Samsung SCH-C355C with MEID Hex:
A0000024AB60A3
8. 1B16- Samsung SCH-U430 with MEID Hex:
A00000141CA131

**All pursuant to Title 18, United States Code, Sections
2253(a)(1) and 2253(a)(3).**

DATED: Buffalo, New York, January 9, 2013.

WILLIAM J. HOCHUL, JR.
United States Attorney

BY: s/Maura K. O'Donnell
MAURA K. O'DONNELL
Assistant United States Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
716-843-5816
Maura.O'Donnell2@usdoj.gov

A TRUE BILL:

s/Foreperson
FOREPERSON